

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

In re Bair Hugger Forced Air Warming
Products Liability Litigation

MDL No. 15-2666 (JNE/FLN)

This Document Relates to All Actions

DECLARATION OF GENEVIEVE M. ZIMMERMAN

1. My name is Genevieve M. Zimmerman and I am a Partner with the Meshbesh & Spence Ltd. law firm. I am a member of the Court appointed Co-Lead Counsel in the above entitled matter.
2. Attached hereto as Exhibit A is a true and correct copy of Michael Mont's Deposition, taken in Cleveland, OH on July 28, 2017.
3. Attached hereto as Exhibit B is a true and correct copy of portions of the Deposition of Corporate Representative Al Van Duren, taken in Minneapolis on January 18, 2017.
4. Attached hereto as Exhibit C is a true and correct copy of an email from Dr. Michelle Hulse-Stevens bearing bates number 3MBH00580475.
5. Attached hereto as Exhibit D is a true and correct copy of Darouiche, et al. "Association of Airborne Microorganisms in the Operating Room With Implant Infections: A Randomized Controlled Trial." *Infection Control & Hospital Epidemiology* (2017).
6. Attached hereto as Exhibit E is a true and correct copy of Zheng et al. "Concentrations and Size Distributions of Airborne Particulate Matter and Bacteria in an Experimental Aviary Laying-Hen Chamber." *Journal of the American Society of Agricultural and Biological Engineers* (2013).

7. Attached hereto as Exhibit F is a true and correct copy of Raval et al. "Real-time monitoring of non-viable airborne particles correlates with airborne colonies and represents an acceptable surrogate for daily assessment of cell-processing cleanroom performance." *Cytotherapy* (2012).
8. Attached hereto as Exhibit G is a true and correct copy of Stocks, et al. "Predicting bacterial populations based on airborne particulates: A study performed in nonlaminar flow operating rooms during joint arthroplasty surgery." *American Journal of Infection Control* (2010).
9. Attached hereto as Exhibit H is a true and correct copy of Seal et al. "Electronic Particle Counting for Evaluating the Quality of Air in Operating-Theaters." *Journal of Applied Bacteriology* (1990).
10. Attached hereto as Exhibit I is a true and correct copy of *Operative Environment*, 2014 Orthopaedic Research Society, J. ORTHOP. RES. 32:S60-S80 (2014).
11. Attached hereto as Exhibit J is a true and correct copy of Michael Mont's Expert Report.

Dated: September 12, 2017

/s/ Genevieve M. Zimmerman

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